

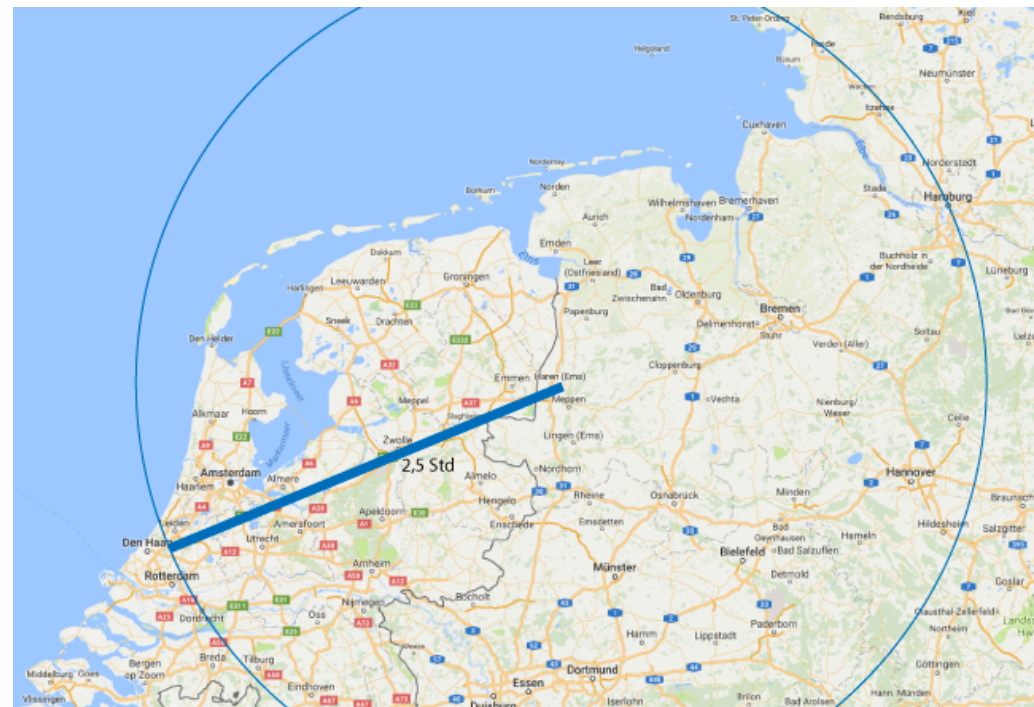
Owner's Perspective

Welcome!

Let's introduce ourselves!

MCC Maritime Competence Center GmbH & Co. KG

- Central location
- Approx. 2,5 hrs HARA range
- By air, anywhere/anytime



Let's introduce ourselves!

Some MCC Facts

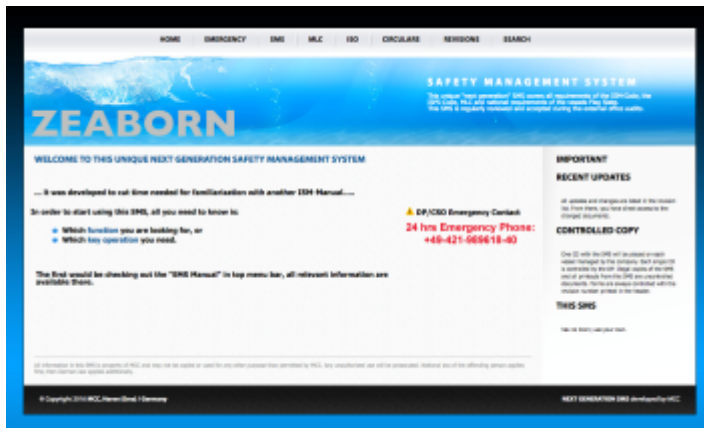
- ISO 9001 certified 1st class maritime consultant
- Celebrating 10 years of service
- Putting maritime regulations into practice
- Experts on US regulations (BWM, VGP, NT-VRP...)
- Presently 10 contracted customers, taking care of 73 vessels
(Dry Cargo, Bulkers, Heavy Lifters, PSV, CTV and Research Vessels)



Let's introduce ourselves!

Some MCC Facts

Electronic Integrated Safety and Quality Management Systems and Paper Based Manuals



Let's introduce ourselves!

Some MCC Facts

- Simply:
We provide Compliance Solutions

Proper
Pre
Planning
Prevents
Poor
Performance

Owner's Perspective

Today's target:

Approximate 17 years to be squeezed into 20 Minutes.

Owner's Perspective

- 1. Ballast Water; Operation and Handling***
- 2. Other challenges in the US***

1. Ballast Water

1st Option:

Do not discharge ballast water within 12 miles.

Pro:

- No financial burden
- May be practicable for container vessels

Con:

- Ballast adjusting necessary for arrival
- Not practicable if a full cargo shall be loaded
- Human error: each single violation will be penalized
- Changes in vessels cargo ops may mean: departure, 12 miles outside BW discharge, and back for cargo ops – additional costs (Pilotage, tugs, etc)

1. Ballast Water

2nd Option:

Install and use a BW treatment system, USCG Approved or AMS (temporary).

Pro:

- Help to prevent invasive species
- Comply with the rules (see Company Policy)

Con:

- Expensive
- Time consuming installation
- Space
- Handling
- Maintenance expenses

1. Ballast Water

3rd (official) Option

Discharge ballast water ashore for further treatment

Pro:

- Nice idea

Con:

- Practically not available in the US
- If available, expensive, time consuming, handling of hoses/pipes
- Ships are not designed to discharge ballast water this way

1. Ballast Water

4th (official) Option

Uptake of ballast water from US public water system

Pro:

- Another nice idea

Con:

- Practically not available in the US
- If available, expensive, time consuming, handling of hoses/pipes
- Ships are not designed to receive ballast water this way

1. Ballast Water

Temporary Option: Extension to the compliance date.

Companies may apply for an extension to install a USCG approved treatment system.

Pro:

- Financially interesting –today-

Con:

- Application with explanations
- More and more systems are USCG approved
- Chances to get an extension are approaching zero
- Sooner or later a treatment system is needed

1. Ballast Water

US East Coast & Gulf Transit

- Uptake and Discharge without additional exchange
- Within 200 nm
- “Route Exemption”
- BW Report within 6 hrs after arrival to port

OMB number 1625-0069
Exp. date: 31-Dec-2018

Ballast Water Management Report

Vessel Information

Vessel name

ID number

Country of Registry

Owner/operator

Type Gross Tonnage

Ballast water volume units

Total ballast water capacity Number of tanks on ship

Onboard BW Management System

Voyage Information

Arrival port (port and state)

Arrival date

Last port (port and country)

Next port (port and country)

Total ballast water on board Number of tanks in ballast

Number of tanks discharged

Alternative BW management conducted, per instructions from COTP ☐

Certificate of accurate information

By checking this box, I attest to the accuracy of the information provided and that ballast water management activities were in accordance with the ballast water management plan required by CFR 151.205(c). ☐

Responsible Officer's name and title

Report type

Submitted by Contact information

Ballast Water History

On the following page(s), provide the ballast water history for each tank discharged into the waters of the United States or to a reception facility, en route to or at the arrival port. Vessels entering the Great Lakes or Hudson River (north of George Washington Bridge) from beyond the US EEZ must also provide the history for empty tanks that underwent alternative management.

1. Ballast Water

US Pacific Coast Transit / Pacific Coast Region (PCR)

- BW from within PCR = exchange > 50 nm
- BW from outside PCR = exchange > 200 nm
- BW Report 24 hrs prior arrival

OMB number 1625-0069
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Ballast Water Management Report

Vessel Information

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ID number

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Type Gross Tonnage

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1. Ballast Water

Other US States have additional and/or other Requirements

- California
- Oregon
- Washington
- Great Lakes
- St. Lawrence Seaway
- **Hawaii (!!)**
- New York
- ...



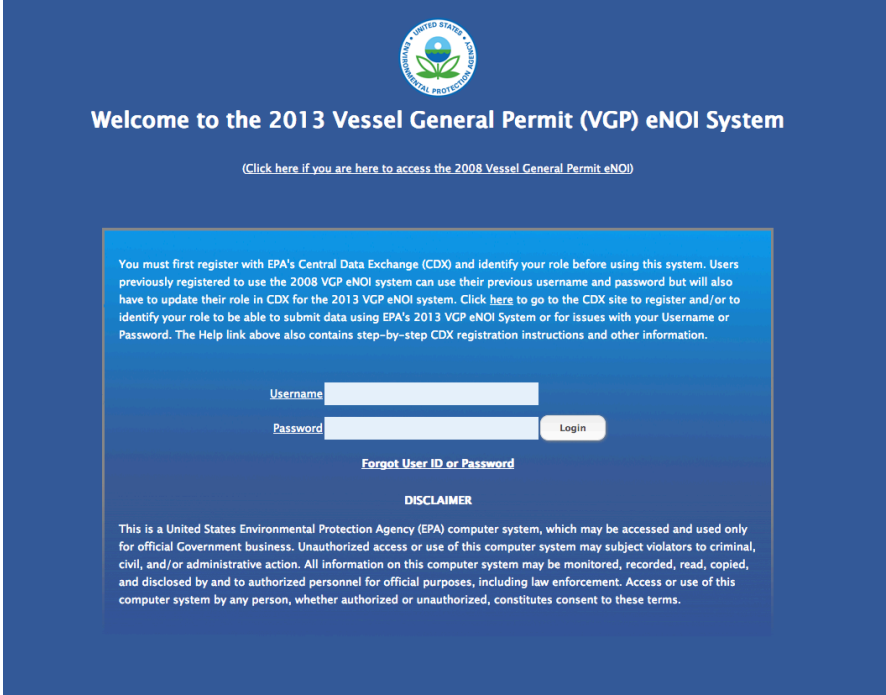
1. Ballast Water

EPA - VGP 2013 / 2018

5 years over next year. VGP 2018 is knocking. Re-registration will be required.

We really hope for an improved online CDX database with less security measures - among others.

User Name and Password, okay.
But **CROMERR 20-5-1** questions.....
Who needs this?



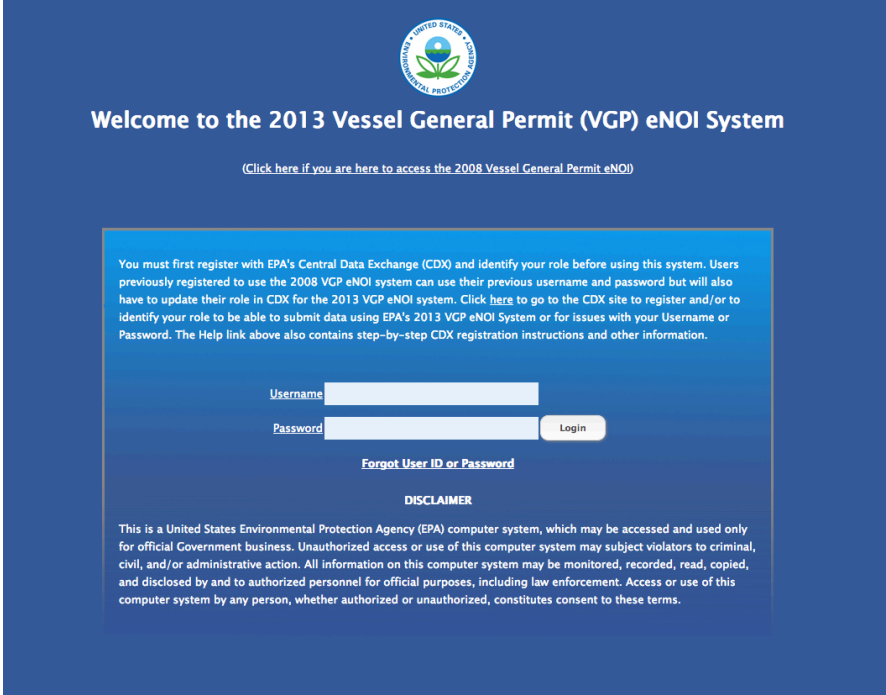
The screenshot shows the login page for the EPA's 2013 Vessel General Permit (VGP) eNOI System. At the top is the EPA logo and the title "Welcome to the 2013 Vessel General Permit (VGP) eNOI System". Below the title is a link: "(Click here if you are here to access the 2008 Vessel General Permit eNOI)". The main content area is a light blue box with text explaining that users must first register with EPA's Central Data Exchange (CDX) and identify their role. It provides instructions for users who were previously registered in the 2008 system. Below the text are input fields for "Username" and "Password", a "Login" button, and a link for "Forgot User ID or Password". At the bottom is a "DISCLAIMER" section stating that this is an EPA computer system and that unauthorized access or use may subject violators to criminal, civil, and/or administrative action. It also states that all information on the system may be monitored, recorded, read, copied, and disclosed by and to authorized personnel for official purposes, including law enforcement. Access or use of the system by any person, whether authorized or unauthorized, constitutes consent to these terms.

1. Ballast Water

EPA - VGP 2013 / 2018

If a BWTS is installed,
Discharge Monitoring Reports are
required.

Sampling & Analysis is compulsory.



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1. Ballast Water

Proper

Pre

Planning

Prevents

Poor

Performance

- Where does the ship sail to?
- Ocean exchange?
- Which US state? Any additional reqs?
- What cargo operations are planned?
- Is the crew prepared?

Owner's Perspective

1. Ballast Water; Operation and Handling



2. Other challenges in the US

2. Other Challenges in the US

SMI (Serious Marine Incident, 46 CFR 4.03-I)

1. Death
2. Injury (professional medical treatment)
3. Damages > 100.000 USD
4. Total loss
5. Discharge of > 10.000 gallons of oil
6. Discharge of a hazardous substance

Have an Alcohol Test Device ready (2hrs for alcohol-, 32 hrs for drug testing).

SMI Report (CG-2692) to be send within 5 (five) days!

Note: SMI reports are available to public, see online database

<https://cgmix.uscg.mil/IIR/IIRSearch.aspx>

2. Other Challenges in the US

Reporting

Probable discharges (“Substantial Thread”) must also be reported!

A probable discharge is, for example oil (fuel-, hydraulic-, lub-) in the cargo hold.

... leaking hydraulic oil from a forklift ... combined with heavy rain ...

2. Other Challenges in the US



“FFB Seating Plan”

As seen on some ships.

USCG Requirement: NO / NONE / NADA

A seating plan is only good for one single Situation: when everyone is fine.

There is no alternative seating plan.

You have to have a boarding procedure in place:

- Missing crew
- Injured crew / stretcher
- Pax?

2. Other Challenges in the US

Safe Practice

Quick Closing Valves should be clearly marked.

Improve identification for the crew and USCG officers during inspections.



2. Other Challenges in the US

FFB Safety Devices

Safety devices connected as “additional lashings”. Crews are unaware of the purpose.

They are to be connected for training, simulation and maintenance only.



LSA not ready. Risk of detention.....


2. Other Challenges in the US

ISPS

Observe PSA (Port Security Advisory).

Implement measures “**EQUIVALENT**” to security level 2 does not require to declare security level 2 by the vessel (impossible anyway).

U.S. Department of
Homeland Security
**United States
Coast Guard**



International Port Security Program
U.S. Coast Guard

Date: 21 August 2017
Contact: Ms. Juliet Hudson
(202) 372-1173

Port Security Advisory (2-17)

A. Background:

The Maritime Transportation Security Act of 2002 (MTSA) has mandated that the United States Coast Guard evaluate the effectiveness of anti-terrorism measures in foreign ports and provides for the imposition of conditions of entry on vessels arriving to the United States from countries that do not maintain effective anti-terrorism measures (MTSA, 46 U.S.C. §§ 70108 - 70110).

The Coast Guard has determined that Micronesia is not maintaining effective anti-terrorism measures in all of its ports. Actions required as listed in paragraphs C and D of this Port Security Advisory take effect for vessels that arrive in the United States upon or after September 5, 2017, after visiting ports in the Federated States of Micronesia as one of their last five ports of call.

B. Countries Affected:

The Coast Guard has determined that ports in the following countries are not maintaining effective anti-terrorism measures:

Cambodia

Cameroon

Exceptions	IMO Port Number
Ebome Marine Terminal	CM394-0001
Quai GETMA (LAMNALCO Base) Facility	CMDLA-0005
Société Nationale de Raffinage (SONARA) Terminal (also known as Cap Limboh Terminal)	CMLIT-0001
Kome-Kribi I	CM234-0001
Douala International Terminal (also known as Douala Containers)	CMDLA-0002
Moudi Terminal	CMMOU-0001

Comoros

Cote d' Ivoire

-More-

2. Other Challenges in the US

Exercises with QI and SMFF Providers

Take part of an “Incident Management Team (IMT) Tabletop Exercise (TTX)” annually and conduct notification drills. RAC (remote assessment and consultation) notifications required with SMFF providers.

Some TTX’s are covering the required SMFF exercise! Check with your QI.

2. Other Challenges in the US

Prepare yourself. Make everyone's life easier.

USCGO's are like you and me. We don't like paperwork and we like to be home by 5.

FREIGHT SHIP EXAM

Vessel Certificates

- ☐ Vessel Registry
- ☐ Classification Document
- ☐ Safe Manning Document (Deck _____ GMDSS _____ Eng _____)
- ☐ International Loadline Certificate
- ☐ International Tonnage Certificate
- ☐ International Oil Pollution Prevention w/Form "A"
- ☐ International Air Pollution Prevention
- ☐ SOLAS Cargo Ship Safety Construction
- ☐ SOLAS Cargo Ship Safety Equipment w/Form "E"
- ☐ SOLAS Cargo Ship Safety Radio Equipment w/Form "R"
- ☐ ISM - Document of Compliance
- ☐ ISM - Safety Management
- ☐ Certificate of Financial Responsibility (COFR)
- ☐ International Ship Security Certificate
- ☐ Continuous Synopsis Record (CSR)
- ☐ If Authorized -
- ☐ Document of Compliance - Carriage of Dangerous Goods
- ☐ Y / N Dangerous Cargo Manifest & Stowage Plan
- ☐ Grain Authorization Letter
- ☐ Y / N Grain Authorization Letter and Loading Manual

Documents and Manuals

- ☐ Last U.S. Port State Control Examination
- ☐ Ships Particulars
- ☐ Crew list
- ☐ Officer Licenses and Flag State Endorsements
- ☐ Oil Record Book - w/ bunker receipts
- ☐ Shipboard Oil Prevention Emergency Plan
- ☐ Non-Tank Vessel Response Plan
- ☐ Ballast Water Management Plan / Report & Confirmation
- ☐ Waste Management Plan, Garbage Log and Receipts
- ☐ Stability Book
- ☐ Loading and Ballasting Manual
- ☐ Cargo Securing Manual
- ☐ Life Saving Training Manual
- ☐ Life Saving Appliance Maintenance Manual
- ☐ Life Raft Service Certificates
- ☐ Firefighting Service Certificates (fixed and portable)
- ☐ Fire Safety Operational Books
- ☐ ISPS Records

IF Bunkering ? - Y / N Declaration of Inspection
 Supplemental Information
 Where is the Emergency Fire Pump Located? (Ventilate Now)
 _____ Have 2 Fire Hoses readied, one on the bridge wing and one all the way forward
 When was the Vessel last in Dry Dock? _____

(Sample USCG vessel boarding check sheet)

Owner's Perspective

1. Ballast Water; Operation and Handling



2. Other challenges in the US



THANK YOU FOR YOUR KIND ATTENTION!

Capt. Andreas Schepers

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